

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

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**CHAD PELISHEK,**

Plaintiff,

Case No.: 2:23-CV-1048

v.

**CITY OF SHEBOYGAN, et al.**

Defendants.

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**DECLARATION OF JORDAN ROHLFING**

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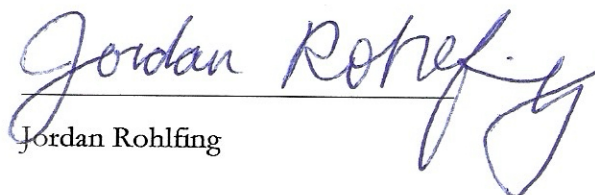
Pursuant to 28 U.S.C. § 1746, the undersigned, Jordan Rohlfig, makes the following statement under penalty of perjury under the laws of the United States.

1. I am an adult citizen of the State of Wisconsin and an attorney and equity partner with the law firm DeWitt LLP with an address of 25 W. Main Street, Suite 800, Madison, Wisconsin 53703.  
I make this Declaration based on my personal knowledge of the facts described herein.
2. I do not represent any of the Parties in this lawsuit. I submit this Declaration at the request of Defendants in the role of expert witness. I have not been paid a fee for my expertise in this matter.
3. I am a 2014 *cum laude* graduate of the University of Wisconsin Law School.
4. I am an attorney duly licensed to practice law in the State of Wisconsin and before this Court.  
I am also admitted to practice before the Seventh Circuit and the U.S. District Court for the Western District of Wisconsin. I was first admitted to practice law in the State of Wisconsin in June 2014.

5. I have practiced continually as a civil litigator since beginning my law practice, with an emphasis in labor and employment relations.
6. I regularly represent and defend private employers, government entities, and government officials in employment litigation in this State, and often before the U.S. District Court for the Western District of Wisconsin, and the U.S. District Court for the Eastern District of Wisconsin. I have also litigated employment matters in federal district courts in Arizona, Pennsylvania, Indiana, and Florida.
7. I have also represented a Wisconsin municipality as outside counsel and am aware of the hourly rates that attorneys in southern Wisconsin generally charge municipalities.
8. I am familiar with and/or have worked with some of the attorneys at MWH Law Group LLP, including Attorneys Warren E. Buliox and Anthony Jackson.
9. Based on my knowledge of the prevailing rates in the community of attorneys who handle civil rights and other complex federal litigation in this court, I believe that an hourly rate of \$300 per hour is a fair and appropriate rate for Attorney Warren Buliox or any partner at his firm who has similar or greater skill, experience and education.
10. Based on my knowledge of the prevailing rates in the community of attorneys who handle civil rights and other complex federal litigation in this court, I believe that an hourly rate of \$250 per hour is a fair and appropriate rate for Attorney Anthony Jackson or any associate level attorney at his firm who has similar or greater skill, experience and education.
11. Based on my experience and/or knowledge, the hourly rates of \$300 per hour for partners and \$250 per hour for associate lawyers are within the range of rates charged to clients who pay by the hour for legal services rendered by attorneys of similar skill, reputation and experience in this legal community for civil rights litigation.

Executed this 5th day of March, 2025

Respectfully submitted by,

  
Jordan Rohlifing